

EXHIBIT 3
FILED UNDER SEAL

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WAYMO LLC,)
Plaintiff,)
vs.) Case No.
UBER TECHNOLOGIES, INC.;) 17-cv-00939-WHA
OTTOMOTTO, LLC; OTTO TRUCKING LLC,)
Defendants.)
_____)

HIGHLY CONFIDENTIAL - OUTSIDE COUNSEL'S EYES ONLY

VIDEOTAPED DEPOSITION OF JENNIFER HAROON

San Francisco, California

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Volume I

Reported by:

MARY J. GOFF

CSR No. 13427

Job No. 2664313

PAGES 1-222

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1	A I think sometimes employees would just	09:40:36
2	check with their manager. And perhaps their manager	09:40:38
3	didn't -- I -- I -- I don't know what the manager	09:40:41
4	thought, but I didn't then follow the rest of the	09:40:44
5	process.	09:40:47

6	Q Okay. Does Waymo have any internal	09:40:48
7	guidelines or policy documents defining what	09:41:01
8	information is confidential and what is not?	09:41:05

9 MS. BAILY: Object to form. 09:41:07

10	A So when I joined, one of the first things	09:41:13
11	I talked to Chris about and was included in his	09:41:17
12	comments for our, what we call, the Chauffeur	09:41:21
13	Noogler orientation was about confidentiality.	09:41:25

14	The project, unlike some at Google, was	09:41:31
15	confidential even within Google, so -- and that was	09:41:34
16	different coming from another Google project. So it	09:41:38
17	was clearly something that was important. And so	09:41:41
18	confidentiality is something we talked about a lot	09:41:44
19	as a company and as a team.	09:41:46

20	In terms of a specific document, I can't	09:41:50
21	think of one. Although, that doesn't mean one	09:41:53
22	doesn't exist. I just can't think of one off the	09:41:56
23	top of my head.	09:41:59

24	Q Okay. But to the best of your knowledge,	09:42:01
25	there's no such document?	09:42:02

1 identification and is attached to the transcript.) 09:55:29

2 Q Okay. Ms. Haroon, the reporter has handed 09:55:30

3 you what's been marked as Exhibit 1136. Can you 09:55:50

4 look at through this, please -- 09:55:55

5 A Yes. 09:55:56

6 Q -- and let me know when I can ask a 09:55:56

7 question? 09:55:58

8 A Okay. 09:58:44

9 Q Do you recognize this document? 09:58:44

10 A I do. 09:58:46

11 Q Okay. And what is this document? 09:58:47

12 A It is a discussion document that the 09:58:50

13 self-driving car team prepared for a discussion with 09:58:54

14 [REDACTED] 09:58:59

15 Q I'm sorry. With? 09:59:01

16 A [REDACTED] 09:59:02

17 Q And what was the purpose of those 09:59:06

18 discussions? 09:59:09

19 A They varied. They normally involved 09:59:15

20 talking about progress on the project, some of our 09:59:18

21 future plans. And in this case, also budget. 09:59:23

22 Q Okay. And the document is entitled 09:59:29

23 "Self-Driving Car: 2016 Budget, Including HC 09:59:34

24 Plans," correct? 09:59:39

25 A Correct. 09:59:40

1 developing relationships with OEMs, car 01:40:16
2 manufacturers. So this was not the strategy as I 01:40:21
3 would describe it. 01:40:27
4 Q Okay. 01:40:28
5 A On 1488, again, I would take this as a 01:41:10
6 discussion document. But [REDACTED] 01:41:16
7 were not part of the business plan when I joined. 01:41:20
8 Q Okay. 01:41:24
9 A So some of the supporting documents 01:42:10
10 support some of the things that I have already 01:42:13
11 mentioned that are no longer part of -- 01:42:16
12 Q Understood. 01:42:19
13 A -- were no longer part of the plan. 01:42:19
14 Q Understood. 01:42:21
15 MS. BAILY: Just for the written record, 01:42:22
16 the witness obviously did not read every line of 01:42:22
17 this document. I -- that's not what I understood 01:42:25
18 you to ask her to do, but for the written record. 01:42:27
19 MR. TAKASHIMA: Agreed. 01:42:31
20 Q (BY MR. TAKASHIMA) Flipping back to the 01:42:32
21 page ending 1484. 01:42:33
22 A 1484. 01:42:36
23 Q The headline is "Reviewed go-to-market 01:42:44
24 Options; selected Transportation as a Service (TaaS) 01:42:47
25 [REDACTED] 01:42:52

1 say that Waymo revisited [REDACTED] at 02:09:53
2 least four times? 02:09:59
3 MS. BAILY: Object to form. 02:10:11
4 A I don't think each discussion document 02:10:11
5 would necessarily be a fresh time that we relooked 02:10:13
6 at [REDACTED] 02:10:17
7 So for example, between -- for February 02:10:21
8 and March 2016, those are not necessarily unique 02:10:24
9 times that we relooked at this. 02:10:29
10 Q Okay. But these -- these four dates seem 02:10:31
11 to indicate that there was some revisit in 2016, 02:10:37
12 2014, and 2013; is that fair to say? 02:10:40
13 MS. BAILY: Object to form. 02:10:44
14 A That's fair to say. Although, I don't 02:10:46
15 know if the 2013 was a revisit or potentially the 02:10:48
16 original. I wasn't there. 02:10:51
17 Q The visit. Okay. Are those -- are those 02:10:53
18 dates -- I mean, in the native format of this 02:11:08
19 document, would those dates be links? 02:11:11
20 MS. BAILY: Object to form. 02:11:14
21 A Yes. 02:11:15
22 Q Okay. To what? 02:11:17
23 MS. BAILY: Object to form. 02:11:18
24 A I don't remember. Likely to a slide 02:11:22
25 discussion document. 02:11:27

1 supplier team. 04:42:49

2 Q Okay. And then, I guess, respectively 04:42:49

3 headcount for products, business and operations? 04:42:55

4 A Right. And business is -- broadly 04:42:59

5 includes things like marketing, PR, policy. 04:43:03

6 Q Okay. I understand that you're not 04:43:06

7 familiar with this specific version of the 04:43:13

8 spreadsheet. Do you know why the headcount figures 04:43:14

9 for everything other than TaaS software are blank 04:43:20

10 after 2017? 04:43:27

11 MS. BAILY: Object to form. 04:43:30

12 A I don't. So there were not a lot of 04:43:34

13 people who had regular access to the P&L. But there 04:43:36

14 would be times where it would make sense, perhaps 04:43:39

15 someone from my team, to save on -- still on Google 04:43:43

16 Drive, their own version and because of research 04:43:48

17 they were doing, to make changes. 04:43:53

18 And that's why I don't recognize this 04:43:55

19 being at any time the official P&L, because I don't 04:43:59

20 recognize it at all. So it's possible, for example, 04:44:01

21 that whoever may -- saved this version was looking 04:44:04

22 at headcount issues. 04:44:09

23 Q Okay. Looking -- just based on looking at 04:44:11

24 two different files, is there a way we would be able 04:44:22

25 to determine whether you were looking at sort of one 04:44:24

1 of the official P&L versions or one of these sort of 04:44:27
2 individually workshopped versions? 04:44:31
3 MS. BAILY: Object to form. 04:44:34
4 A So if I had the file name, there was a 04:44:35
5 specific file name used for the official version 04:44:38
6 that I would likely recognize. 04:44:45
7 And then there are -- certainly like this, 04:44:49
8 there are times when I can just look at the contents 04:44:52
9 and know that it's not an official version. But I 04:44:56
10 don't know if I would be able to identify -- you 04:44:58
11 know, if there was one cell change -- 04:45:00
12 Q Okay. 04:45:03
13 A -- from an official version, if that was 04:45:03
14 not one. 04:45:05
15 Q Okay. And do you recall what the official 04:45:06
16 file name was for the -- the official versions? 04:45:10
17 A I don't recall the full name. But 04:45:15
18 certainly there would be as part of it, in brackets, 04:45:19
19 "Go, slash, Chauffeur P&L." 04:45:24
20 And normally when people made their own 04:45:28
21 version to -- to do some testing or to test some 04:45:31
22 changes, for themselves they would label -- they 04:45:36
23 would add on some label, like what they were doing 04:45:39
24 it for. 04:45:43
25 Q Okay. I'm going to the next tab, which is 04:45:44